

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

ROSY GIRON DE REYES; JOSE
DAGOBERTO REYES; FELIX ALEXIS
BOLANOS; RUTH RIVAS; YOVANA
JALDIN SOLIS; ESTEBAN RUBEN
MOYA YRAPURA; ROSA ELENA
AMAYA; and HERBERT DAVID
SARAVIA CRUZ,

Plaintiffs,

vs.

WAPLES MOBILE HOME PARK
LIMITED PARTNERSHIP; WAPLES
PROJECT LIMITED PARTNERSHIP; and
A.J. DWOSKIN & ASSOCIATES, INC.,

Defendants.

Civil Action No. 1:16-cv-563-TSE-TCB

JOINT MOTION TO AMEND SCHEDULING ORDER

Pursuant to Fed. R. Civ. P. 6(b) and Local Civil Rule 7(F), Plaintiffs Rosy Giron de Reyes, Jose Dagoberto Reyes, Felix Alexis Bolanos, Ruth Rivas, Yovana Jaldin Solis, Esteban Ruben Moya Yrapura, Rosa Elena Amaya, and Herbert David Saravia Cruz (collectively “Plaintiffs”) and Defendants Waples Mobile Home Park Limited Partnership, Waples Project Limited Partnership, and A.J. Dwoskin & Associates, Inc. (collectively “Defendants”), hereby jointly stipulate and move this Court to amend the Court’s Scheduling Order dated August 18, 2016 (Dkt. 47) to extend the expert discovery deadlines provided therein.

On August 17, 2016, the parties jointly filed a Proposed Discovery Plan (Dkt. 41), in which the parties proposed a discovery schedule, including certain deadlines for expert discovery. On August 18, 2016, the Court entered a Scheduling Order (Dkt. 47), adopting the discovery schedule from the Joint Discovery Plan.

Thereafter, on August 26, 2016, the Court entered an order (Dkt. 54) temporarily staying Defendants' discovery responses until ten days after the Court ruled on Defendants' Motion to Dismiss. The Court denied the Motion to Dismiss on September 1, 2016 (Dkts. 56, 57). Discovery, including document production, is ongoing. Accordingly, the parties respectfully and jointly request that the Court amend the upcoming expert discovery deadlines as follows:

1. The parties request that the deadline for Plaintiffs' opening expert reports under Rule 26(a)(2)(B) and disclosures under Rule 26(a)(2)(C) be extended by fourteen (14) days, to October 28, 2016.
2. The parties request that the deadline for Defendants' expert reports responding to Plaintiffs' opening expert reports and disclosures be extended by ten (10) days to November 28, 2016.
3. The parties request that the deadline for Plaintiffs' expert reports replying to Defendants' responsive expert reports be extended by nine (9) days to December 9, 2016.

The parties have not previously requested an extension of time for any discovery dates, and no change is sought with respect to the date for the final pretrial conference. A proposed Order amending the expert deadlines and granting the extension is attached hereto.

Dated: October 5, 2016

Respectfully submitted,

/s/ Paul Brinkman

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